

**JAMES KOUSOUROS**

ATTORNEY AT LAW

JAMES KOUSOUROS  
FOUNDER & PRINCIPAL

260 Madison Avenue, 22nd floor • New York, NY 10016  
212•532•1934 / 212•532•1939 fax  
E-mail: James@kousouroslaw.com

EMMA J. COLE  
LEGAL ASSISTANT

November 29, 2020

**BY ECF**

Hon. Lorna G. Schofield  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Jose Cespedes, 20 Cr. 369 (LGS)**

Dear Judge Schofield,

This letter is to respectfully request one final two-week adjournment for motions to be filed in this case. As we have previously set forth, the discovery in this case is voluminous as it involves several warrants, including an eavesdropping warrant and a lengthy post arrest interview of my client. We have been diligently reviewing this discovery while discussing a disposition with the Government. Our discussions have been fruitful and we believe will resolve the matter, however, they have included certain fact specific issues which required not only a review of the warrants and affidavits but more importantly the fruits thereof. There are a multitude of conversations, texts and other materials from which these facts have been gleaned. We have hopefully resolved the final adjustment and again we believe the matter will be resolved shortly. Accordingly, we request this additional time in the hope that we can avoid additional litigation and not jeopardize our negotiations. I assure this Court again that this has been a time-consuming task and that we have been working diligently to resolve the outstanding issues relating to a disposition.

We have consulted with the Government and there is no objection to this request. We consent to the exclusion of this time from speedy trial calculations as it constitutes continued motion practice, and we require this additional time to review the discovery and discuss a disposition with the Government.

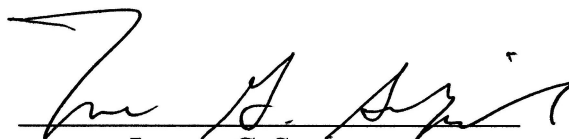
Application Granted. Defendants' motion(s), if any, shall be filed by **December 18, 2020**. The Government's response shall be filed by **January 5, 2021**. Defendants' reply shall be filed by **January 15, 2021**. All other dates shall remain unchanged. The Clerk of the Court is directed to terminate the letter motions at docket number 43.

Dated: December 2, 2020  
New York, New York

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_

James Kousouros, Esq.  
c.c.  
Peter Davis  
*Assistant United States Attorney*



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**